

TO THE COURT OF CRIMINAL APPEALS

No. PD-0703-16

FILED  
COURT OF CRIMINAL APPEALS  
11/18/2016  
ABEL ACOSTA, CLERK

STEPHEN HOPPER

From the Fourteenth Court of Appeals  
No. 14-15-00371-CR  
339<sup>th</sup> District Court No. 673236  
Harris County, Texas

vs.

STATE OF TEXAS

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**Appellant's Motion to Extend Time  
to File Brief on the Merits**

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TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, STEPHEN HOPPER, and files this his Motion to Extend Time to File Brief on the Merits, and in support thereof, would respectfully show the Court the following:

I.

This Court granted the State's and the Appellant's petitions for discretionary review on October 19, 2016. The appellant's brief is due November 18, 2016. No previous motions for extension have been filed.

II.

Counsel for the appellant has been engaged in work in the Harris County Public Defender's Office on many cases, including those listed below. Additionally, counsel has been working on a condensed schedule as she prepares to be out of town next week. Counsel is working to provide an excellent brief to aid this Court in its decision in this complex and important case.

- *William Tutson*, 14-16-00514-CR
- *Janai Atkins*, 01-16-00080-CR
- *Fabio Gamboa*, 1459990
- *Lamoyne Cheney*, 2077630
- *Audelio Trevino*, 14-16-00268-CR
- *Reginald Smith*, 13-16-00185-CR
- *Jarvis Carnell*, 01-15-00519-CR
- *Tairon Monjaras-Guirola*, 01-15-01092-CR
- *Emanuel Hayes*, 01-15-00982-CR
- *LT Lewis*, 01-16-00485-CR
- *Bartolo Perez*, 01-14-00061-CR
- Counsel has been serving as the Educational Internship Coordinator and administrator of the Second Chair Program for the Harris County Criminal Lawyers Association
- Counsel has been researching and writing for several trial cases assigned to the Public Defender's Office Trial Division.

### III.

Appellant's attorney requests an extension of 30 days, until December 18, 2016, which is necessary so that the brief can be thoroughly written and timely filed. This motion is not made for the purpose of delay.

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PRAYER

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WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Honorable Court grants this requested extension of time to file the appellant's brief on the merits in the above cause and extend the time for filing to December 18, 2016.

Respectfully submitted,

ALEXANDER BUNIN  
Chief Public Defender  
Harris County, Texas

/s/Sarah V. Wood  
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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that a true and correct copy of the above and foregoing Appellant's Motion to Extend Time to File Brief on the Merits has been served on the State Prosecuting Attorney and the District Attorney of Harris County, Texas, via the e-file service.

/s/Sarah V. Wood  
Sarah V. Wood